

U.S. Department of Justice

United States Attorney Eastern District of New York

WK F. #2016R01805 271 Cadman Plaza East Brooklyn, New York 11201

August 8, 2019

By Email and ECF

All Counsel on Attached Appendix A

Re: United States v. Jeffrey Chartier, et al. Criminal Docket No. 17-372 (JS)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure, which pertains to defendant Lawrence Isen, supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

The government has made the following materials available at First Choice Copy ("First Choice") for reproduction to the defendants:

Source	First Bates	Last Bates
Alpine Securities – Trading Records – RBNW	EDNY-PTP_000509842	EDNY-PTP_000510430
ATT – Communication Records – RBNW	EDNY-PTP_000510431	EDNY-PTP_000512099
Comcast – Communication Records – RBNW	EDNY-PTP_000512100	EDNY-PTP_000512101
CSC Holdings - Communication Records – RBNW	EDNY-PTP_000512102	EDNY-PTP_000512152
Interactive Brokers – Trading Records – RBNW	EDNY-PTP_000512153	EDNY-PTP_000512317
JP Morgan Chase – Bank Records – RBNW	EDNY-PTP_000512318	EDNY-PTP_000512319
Platinum Stock Transfer – Trading Records – RBNW	EDNY-PTP_000512320	EDNY-PTP_000516365
Verizon – Communication Records – RBNW	EDNY-PTP_000516366	EDNY-PTP_000516367
Verizon Wireless – Communication Records – RBNW	EDNY-PTP_000516368	EDNY-PTP_000517010
Wells Fargo Bank – Bank Records – RBNW	EDNY-PTP_000517011	EDNY-PTP_000517360
Alpine Securities – Trading Records – RBNW	EDNY-PTP_000575204	EDNY-PTP_000586176
ATT – Communication Records – RBNW	EDNY-PTP_000586177	EDNY-PTP_000592036
Comcast – Communication Records – RBNW	EDNY-PTP_000592037	EDNY-PTP_000592048

Defense Counsel August 8, 2019 Page 2

Source	First Bates	Last Bates
COR Clearing – Trading Records – RBNW	EDNY-PTP_000592049	EDNY-PTP_000594437
Cox Communications – Communication Records – RBNW	EDNY-PTP_000594438	EDNY-PTP_000594443
CSC Holdings – Communication Records – RBNW	EDNY-PTP_000594444	EDNY-PTP_000594459
E*Trade Financial – Trading Records – RBNW	EDNY-PTP_000594460	EDNY-PTP_000594795
Fidelity Brokerage Services – Trading Records – RBNW	EDNY-PTP_000594796	EDNY-PTP_000597531
Interactive Brokers – Trading Records – RBNW	EDNY-PTP_000597532	EDNY-PTP_000599177
JP Morgan Chase – Bank Records – RBNW	EDNY-PTP_000599178	EDNY-PTP_000599722
Lek Securities – Trading Records – RBNW	EDNY-PTP_000599723	EDNY-PTP_000600017
Santander Bank – Bank Records – RBNW	EDNY-PTP_000600018	EDNY-PTP_000600093
Sprint – Communication Records – RBNW	EDNY-PTP_000600094	EDNY-PTP_000600341
TD Ameritrade – Trading Records – RBNW	EDNY-PTP_000600342	EDNY-PTP_000600520
Verizon – Communication Records – RBNW	EDNY-PTP_000600521	EDNY-PTP_000600525
Valley National Bank – Bank Records – RBNW	EDNY-PTP_000600526	EDNY-PTP_000600936
Verizon Wireless – Communication Records – RBNW	EDNY-PTP_000600937	EDNY-PTP_000602105
Fidelity Brokerage Services – Trading Records – RBNW	EDNY-PTP_000602106	EDNY-PTP_000602106

Where affidavits concerning the authenticity of business records are included herein or in previous discovery productions, per Federal Rules of Evidence 803(6) and 902(11) the government intends to proffer those records into evidence at trial as self-authenticating. <u>See United States v. Komasa</u>, 767 F.3d 151 (2d Cir. 2014).

Defense Counsel August 8, 2019 Page 3

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

RICHARD P. DONOGHUE United States Attorney Eastern District of New York

By: /s/
Whitman G.S. Knapp
Assistant U.S. Attorney
(718) 254-6107

cc: Clerk of the Court (JS) (by ECF)

APPENDIX A: DEFENSE COUNSEL

Robert P. LaRusso, Esq. LaRusso Conway & Bartling LLP 300 Old Country Road, Ste. 341 Mineola, New York 11501

Kevin J. Keating, Esq. Law Office of Kevin J. Keating 666 Old Country Road, #501 Garden City, New York 11530

John F. Kaley, Esq. Doar Rieck Kaley & Mack 217 Broadway, Ste. 707 New York, New York 10007

Joseph W. Ryan, Jr., Esq. Melville Law Center 225 Old Country Road Melville, New York 11747-3111